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September 30, 2003

Marianne Lamont Horinko, Acting Administrator
US Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

E-mail: chem.rtk@epa.gov; oppt.ncic@epa.gov

Attention: Chemicals Right-to Know Program

RE: Submittal of Information for the HPV Program
Submittal of Revised Robust Summaries and Revised Test Plan for CAS No.156-60-5

Dear Ms. Horinko:

PPG Industries, Inc. is resubmitting the Robust Summaries and Test Plan for *trans*-1,2-Dichloroethylene (CAS No. 156-60-5) due to revisions we made in the Robust Summaries and Test Plan. Please post the revised Test Plan and Robust Summaries on the EPA HPV website.

We have reviewed the comments posted to the website concerning our prior submissions, and considered the various suggestions contained in the comments. We have subsequently revised the Test Plan and incorporated responses to the comments in the Test Plan.

The HPV Test Plan has been revised to address the following issue raised in the comments:

1. *Adequacy of existing data on environmental fate.*
One comment recommended that additional data on biodegradation be provided. In order to provide the base set data needs of the HPV Challenge Program, PPG will conduct a biodegradation study following the OECD guidelines.
2. *Adequacy of existing data on ecological effects.*
Our original test plan proposed use of surrogate data from 1,1-dichloroethylene to satisfy data needs for ecological endpoints. Comments suggested that there was inadequate justification for use of surrogate data and a need for changes in the robust summaries for the data provided. The revised Test Plan includes additional justification for use of surrogate data from 1,1-dichloroethylene. Additionally, the revised Robust Summaries and Test Plan contain data on a study of *trans*-1,2-

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dichloroethylene on *Daphnia* that was not included in our original submissions. No additional testing for ecological endpoints will be conducted.

Please send an electronic acknowledgement of receipt of these documents to James Barter at barter@ppg.com.

If you have any questions, please do not hesitate to contact me.

Yours truly

James A. Barter, Ph.D.
Director, Environmental Health Sciences & Toxicology